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December 6, 2023

VIA ECF

Honorable James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS") (collectively, the "City Defendants") in the above-referenced matter. The Complaint alleges that from January 2021 until August 2023, based on false reports of child neglect and abuse, ACS unlawfully conducted several investigations of Plaintiff. I write to respectfully request a 46-day extension of the defendants' time to respond to the Complaint.

I was assigned to represent the City Defendants recently and am still working to familiarize myself with the dispute. The requested extension will enable me to obtain and review the lengthy ACS files of the multiple investigations and to prepare an appropriate response. Accordingly, City Defendants respectfully request an extension of time to respond to the Complaint from December 7, 2023, until January 22, 2024. This is the City Defendants' first request for an extension of time to respond to the Complaint.

In addition, this office is in the process of determining whether it will represent any of the individual defendants named in the Complaint.¹ To allow sufficient time for the completion of representation interviews with the individual defendants and/or to permit any of the individual

¹ In addition to the City Defendants, the Complaint names as individual defendants Ariel Semper; Nadine Cenord; Bernadet Jean-Louis; Donna McFadden; Ana Costa; Taiesha Coleman; and Leydi Taveras.

defendants to retain other counsel, I also respectfully request that the Court grant a matching 46-day extension of the individual defendants' time to respond to the Complaint *sua sponte*.

Plaintiffs consent to the extension of both the City Defendants' and the individual defendants' time to respond to the Complaint until January 22, 2024.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez
Assistant Corporation Counsel